

NS

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

ALAN E. COOPER, M.D.
for himself and on behalf of the
United States of America
Relator,

v.

POTTSTOWN HOSPITAL CO., LLC
d/b/a POTTSTOWN MEMORIAL
MEDICAL CENTER
and
COMMUNITY HEALTH SYSTEMS, INC.
Defendants

CIVIL ACTION NO. 13-01137(NS)

JURY TRIAL DEMANDED

FILED

AUG - 5 2014

MICHAEL KUNZ, Clerk
By Dep. Clerk


STIPULATION

AND NOW, this 31st day of July, 2014, it is hereby stipulated and agreed by the parties, through their respective counsel, that:

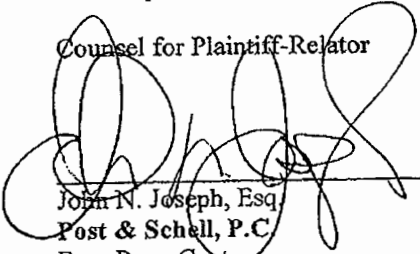
1. Within five (5) days of the date of the Court's approval of this Stipulation, Plaintiff shall file and serve an Amended Complaint in the form attached hereto as Exhibit "A";
2. Pursuant to the said Amended Complaint, and Fed.R.Civ. P. 15(a), 15(c) and 20, Community Health Systems Professional Services Corporation ("CHSPSC") shall be joined and substituted as a Defendant in place of Community Health Systems, Inc. ("CHSI");
3. All amendments set forth in the Amended Complaint that pertain to CHSPSC shall relate back to the date of filing the Plaintiff's original Complaint;
5. Upon the filing of the Amended Complaint, CHSI's pending Motion to Dismiss Plaintiff's Complaint pursuant to Fed.R.Civ. 12(b) (Doc. 27) shall be marked WITHDRAWN,

and all of Plaintiff's claims against CHSI pleaded in the original Complaint shall be
DISMISSED WITHOUT PREJUDICE; and

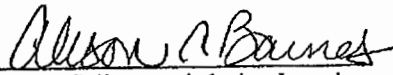
6. Defendant Pottstown Hospital, Co., LLC's pending Motion to Dismiss Plaintiff's
Complaint (Doc. 28) shall be MOOTED by the filing of Plaintiff's Amended Complaint.
Defendants shall respond to the Amended Complaint within the time permitted under
Fed.R.Civ.P. 12.


Robert A. Davitch, Esq.
Wade A. Albert, Esq.
Siddhoff, Pincus & Green, P.C.
2700 Aramark Tower
1101 Market Street
Philadelphia, PA 19107

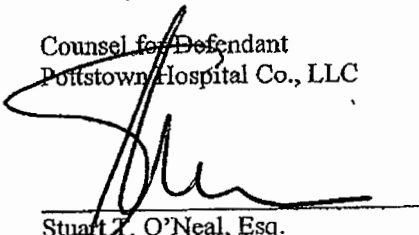
Counsel for Plaintiff-Relator


John N. Joseph, Esq.
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103

Counsel for Defendant
Pottstown Hospital Co., LLC


Alison C. Barnes (admitted pro hac vice)
Robbins, Russell, Englert, Orseck,
Untereiner & Sauber LLP
1801 K Street N.W., Suite 411-L
Washington, DC 20006

Counsel for Defendant
Pottstown Hospital Co., LLC

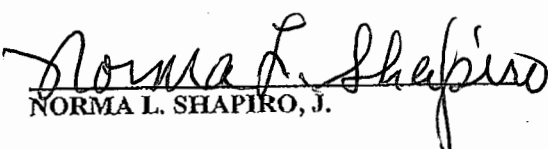

Stuart T. O'Neal, Esq.
Burns White, LLC
100 Four Falls, Suite 515
1001 Conshohocken State Road
West Conshohocken, PA 19428

Attorney for Defendant
Community Health Systems, Inc.

APPROVED BY THE COURT AND SO ORDERED ON THIS 5th DAY OF August, 2014.

BY THE COURT:

ENTERED
AUG -5 2014
CLERK OF COURT


NORMA L. SHAPIRO, J.